

L.B.F. 2016-3A

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Edwin Dennis

) Chapter 13

) Bankruptcy No. 19-10671elf

Debtor(s))

AMENDED MOTION TO MODIFY CHAPTER 13 PLAN POST-CONFIRMATION

Pursuant to L.B.R. 3015-5, the debtor(s) request(s) an order permitting modification of the Chapter 13 plan post-confirmation and make(s) the following representations in support of this request:

1. The debtor(s) filed this Chapter 13 bankruptcy petition on February 2, 2019.
2. The Third Amended Chapter 13 Plan was confirmed on September 10, 2019.
3. The Plan was modified by Order of this Court on June 16, 2021.
4. The base amount of the proposed modified Plan is \$27,1 including trustee's Commission .
5. To date, Debtor has paid \$9,070.08.
6. Debtor's case had been dismissed but reinstated on March 15, 2022, leaving an arrearage balance of \$1,075.92. April and May payments are also outstanding.
7. Debtor's mortgagee has also filed a Motion for Relief and has agreed to put the interim post-petition mortgage payments totaling \$4,216.44 in the modified Plann.
8. The new proposed base amount is \$27,196.00. Debtor proposes to pay the new Plan balance over the remaining 45 months of the 84-month Plan period in monthly increments of \$402.80, commencing with the June 2022 payment.
9. The decrease in plan payment will be from \$537.60 to \$402.80. Amended Schedules I and J will be filed herewith.

WHEREFORE, the Debtor prays that this Court grant the Amended Motion to Modify Chapter 13 Plan Post-Confirmation.

/s/ Sharon S. Masters, Esq.

Sharon S. Masters, Esq.

Counsel for Debtor(s)

Dated: 4/16/2022

